

EXHIBIT 1

Joe Reiter

Subject: FW: Monster v. VPX / Owoc

From: Timothy Branson <tbranson@grsm.com>

Sent: Monday, March 25, 2019 4:58:56 PM

To: Steve Feldman

Subject: RE: Monster v. VPX / Owoc

Hi Steve, sorry for the delay here. Before I confirm with the client on this, can you please send us a copy of the proposed amended complaint? Thanks.

TIMOTHY K. BRANSON | Partner

GORDON & REES

SCULLY MANSUKHANI

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From: Steve Feldman <sfeldman@hueston.com>

Sent: Monday, March 25, 2019 4:17 PM

To: Timothy Branson <tbranson@grsm.com>

Subject: Re: Monster v. VPX / Owoc

Tim:

I'm following up on my below email. Can you confirm today please?

Thanks,
Steve

Steven N. Feldman
HUESTON HENNIGAN LLP

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direct 213 788-4272 | sfeldman@hueston.com | [Bio](#)
523 West 6th St, Suite 400 | Los Angeles, CA 90014

From: Steve Feldman <sfeldman@hueston.com>
Date: Thursday, March 21, 2019 at 6:18 PM
To: Timothy Branson <tbranson@grsm.com>
Subject: Re: Monster v. VPX / Owoc

Tim:

As we just discussed, Defendants have consented to Monster filing its Amended Complaint. All we need pursuant to the Federal Rules is written consent, not a formal stipulation. Please confirm your agreement in writing.

When we spoke, I also explained that we disagreed with your view on personal jurisdiction, and believe that Owoc is subject to personal jurisdiction under applicable case law.

Thanks very much,
Steve

Steven N. Feldman
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From: Timothy Branson <tbranson@grsm.com>
Date: Wednesday, March 20, 2019 at 1:29 PM
To: Steve Feldman <sfeldman@hueston.com>
Subject: Monster v. VPX / Owoc

Steve,

Thanks for taking the time to speak about this case today. As promised, please see the attached motion to dismiss we filed in the *Imran v. VPX* matter (N.D. Cal), wherein we sought the dismissal of Jack Owoc for lack of personal jurisdiction. As anticipated, Mr. Owoc was promptly dismissed as a defendant upon receipt of our motion, and the circumstances here are identical. Please review and consult with your client whether you will voluntarily dismiss him from the case. Should your client decline and we are forced to proceed with a 12(b)(2) motion, which as you can see should be unnecessary, we plan to also serve you with a motion for sanctions under Rule 11. However, I fully expect that we will come to an agreement on this.

Thanks, and let me know you have any questions.

Tim

TIMOTHY K. BRANSON | Partner

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